

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

VLSI TECHNOLOGY LLC, )  
Plaintiff, )  
v. ) Lead Case. 1:19-cv-977-ADA  
INTEL CORPORATION, ) (Consolidated with Case Nos. 6:19-cv-254-  
Defendant. ) ADA, 6:19-cv-255-ADA, 6:19-cv-256-ADA)  
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)

**JOINT STIPULATION**

Plaintiff VLSI Technology LLC (“VLSI”) and Defendant Intel Corporation (“Intel”), by and through their respective counsel, and subject to the approval of the Court, hereby stipulate and agree to the following in the above-captioned litigations:

1. VLSI will not oppose Intel’s amendment to its final invalidity contentions for U.S. Patent No. 6,366,522 as set forth in an April 13, 2020 email to VLSI’s counsel. Intel’s amended contentions for that patent served on VLSI on April 13, 2020 will now serve as the operative final invalidity contentions for the patent.
2. Intel will not oppose VLSI’s amendment to its final infringement contentions for U.S. Patent No. 7,606,983 as set forth in an April 3, 2020 email to Intel’s counsel. VLSI’s amended contentions for that patent served on Intel on April 3, 2020 will now serve as the operative final infringement contentions for the patent.
3. Intel will not oppose VLSI’s filing of its Second Amended Complaint in Case No. 6:19-cv-255-ADA, with respect to redline edits set forth in a draft served on April 13, 2020, which contains amendments with respect to U.S. Patent No. 6,366,522. For clarity, in not opposing,

Intel does not agree that amendments VLSI made in its First Amended Complaint in Case No. 6:19-cv-255-ADA that are also included in its Second Amended Complaint are proper, including amendments reflected in Paragraphs 31-39, 45-49, 77-85, and 91-95 of the Second Amended Complaint, and/or any other allegations concerning willful infringement.

4. VLSI agrees that Intel's pending Motion to Dismiss (Dkt. 128) need not be refiled and may be considered as having been filed against VLSI's Second Amended Complaint.

Dated: May 4, 2020

By: /s/ Andy Tindel

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**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] – Document Filing System, to all counsel of record, on this 4th day of May, 2020.

*Andy Tindel* \_\_\_\_\_  
Andy Tindel